

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
District of Maryland

United States of America)
v.)
WILLIAM DEON REDD, aka "Savage") Case No.
DOB: 8-16-1985)
)
)
)
)

13-0534 TJS

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2010 through September 2011 in the county of Frederick in the
District of Maryland, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i> |
|--|---|
| Title 18, United States Code, Section 1962(d) | Conspiracy to Participate in a Racketeering Enterprise. |

This criminal complaint is based on these facts:

See attached Affidavit of FBI Special Agent Matthew J. Vilcek.

Continued on the attached sheet.


Complainant's signature

Special Agent Matthew J. Vilcek, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/18/2013

City and state: Baltimore, Maryland


Judge's signature
Timothy J. Sullivan, U.S. Magistrate Judge

Printed name and title

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AFFIDAVIT FOR COMPLAINT

Special Agent Matthew J. Vilcek, Federal Bureau of Investigation, being duly sworn, states the following:

I. AFFIANT'S EXPERIENCE

1. Your affiant is a Special Agent with the Federal Bureau of Investigation (FBI) and has been employed in that capacity since March, 1999. Your affiant is currently assigned to the Armed Mobile Surveillance Team as of January 14, 2013. Prior to the current assignment, your affiant was assigned to the Frederick (Maryland) Resident Agency of the FBI's Baltimore Division since March of 2010, and was tasked with investigating a variety of federal criminal violations, including organized crimes and violent crimes. Your affiant has gained extensive experience as a case agent in previous matters involving federal violations pertaining to violent crimes, crimes against children, and white collar crimes. Your affiant's other previous assignments have included several years as an investigator of offenses related to the sexual exploitation of children and service at FBI Headquarters as a Supervisory Special Agent in the Innocent Images Unit (Cyber Division). Between 2001 and 2002, your affiant served on a "Safe Streets" task force tasked with investigating drug dealers and their associates in and around the most violent sections of Baltimore city. While serving on the "Safe Streets" task force, your affiant worked almost exclusively on identifying violent street-level drug dealers and their associates, including members of a localized West Baltimore street gang. As such, your affiant became learned in the methods, tactics and motivations of street level drug dealers/gang members through interviews of confidential human sources, conducting or otherwise participating in numerous drug related search/arrest warrants and personally observing hundreds of hand-to-hand drug transactions during covert physical surveillance. Your affiant has also

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been assigned to a white collar crime squad and tasked with investigating corrupt state/local police officers and their associates. Your affiant is a certified FBI Defensive Tactics Instructor, FBI Firearms Instructor, and FBI Tactical Instructor in the Baltimore Division and, prior to employment with the FBI, was a Special Investigator for the Pennsylvania State Ethics Commission tasked with conducting sensitive investigations pertaining to violations of the Pennsylvania Ethics Law by state and local public officials. Your affiant is a Certified Public Accountant (CPA) currently on inactive licensing status in the state of Pennsylvania.

2. As a law enforcement officer, your affiant has participated in numerous investigations, including those related to unlawful drug distribution and gangs, which involved the use of confidential informants, undercover meetings, physical and electronic surveillances, telephone toll analysis, investigative interviews, the execution of search warrants, and the recovery of substantial quantities of narcotics, narcotics proceeds, firearms, and related paraphernalia.

II. STATEMENT OF FACTS AND CIRCUMSTANCES

3. This affidavit is made in support of a criminal complaint against the following person:

WILLIAM DEON REDD,
aka "Savage"
DOB: 8/16/1985
Male; African American
32 E. Washington Street, Apt 5
Hagerstown, MD 21740
MD SID: 2490704
FBI #864155CC4

4. Your affiant has personally participated in the investigation of the offenses referred to in this affidavit and has witnessed many of the facts and circumstances underlying this investigation. In addition, the statements contained in this affidavit are based on reliable

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information provided by other law enforcement agents and cooperating witnesses, as well as official documents and reports reviewed in furtherance of the investigation. Since this affidavit is submitted for the limited purpose of supporting the criminal complaint, I have not included each and every fact known to me that relates to this investigation. I have set forth only the facts necessary to establish probable cause that **WILLIAM DEON REDD, also known as "Savage,"** being a person employed by and associated with the South Side Brims, an Enterprise engaged in, and the activities of which affected interstate and foreign commerce, together with persons more fully described herein, did knowingly and intentionally conspire to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise through a pattern of racketeering activity, in violation of Title 18 United States Code, § 1962(d).

5. In or around September 2008, the Federal Bureau of Investigation (FBI) and the Maryland State Police (MSP) began investigating a street gang in Frederick County, Maryland, believed to be dealing large quantities of illegal controlled substances to include crack cocaine, cocaine hydrochloride, ecstasy, marijuana and other illegal substances. The gang members were also committing armed robberies, stabbings, shootings, and other activities designed to raise capital in furtherance of their drug trafficking and to create fear, ensure status within the organization, and intimidate those not part of the gang. This gang, the "South Side Brims" (hereinafter SSBs") are a branch or faction of the gang nationally known as the "Bloods".

6. Relevant to this investigation, the evidence gathered reflected that in 2003, Demetrius Smith, a/k/a "Big Blood," originally from Compton's Fruit Town Brims - a precursor to the SSBs, was incarcerated in the Maryland Department of Corrections. While serving his time, Smith met and recruited the defendant, Andre Roach, a/k/a "Squeaky," (Roach) to become a member of the Fruit Town Brims. Roach is currently serving more than 50 years incarceration

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in the State of Maryland's North Branch Correctional Facility, in Cumberland, Maryland, on a second degree murder conviction. In 2005, after achieving the rank of lieutenant under Smith, Roach, via a letter, was granted permission by Smith to start a new Bloods Set in Maryland called the South Side Brims (SSB's). Roach was addressed as "Redrum" in the letter, and was granted "Original Gangster" (O.G.) status, which signifies a leadership position within a Bloods set. This letter was intercepted by the Maryland Division of Corrections.

7. After obtaining permission to start his own Bloods set, Roach began building the ranks of this new set from prison. Through a review of jail letters and gang documents your affiant knows that Roach, by 2005, was a "Triple OG" of the SSB's. This rank is even higher than an "O.G." and is indicative of a growing rank structure within the SSB organization. In a letter from Roach to "the First Lady," Monique Hagler, dated April 18, 2005, obtained in this investigation, Roach requested that Hagler type and save official gang documents on a computer.¹ These communications and others described herein, establish beyond question the existence of the enterprise charged in the Indictment, the South Side Brims. The letters establish that there is a well defined chain of command within this criminal organization beginning in 2005. During a search warrant executed at Hagler's home in March of 2010, agents recovered many of these and hundreds of other documents. Records maintained by Hagler included the history of the SSBs, lists of members, their ranks, dates of birth, addresses, and the date they "came home" or joined the set. The government will produce many of these documents at trial.

8. In the early morning hours of December 5, 2009, Frederick City Police responded to the Motel 6 in Frederick, Maryland, for a report of a stabbing on the parking lot. Present at the

¹ These documents included a Brim Association Blood Application; A list of 23 "body signs;" The Brim's Organizational Structure; the Universal Brim Roll Call; and, The Brim's Concept of War. Most were to be signed: "From your Founder/Triple O.G. Redrum."

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Motel at that time, according to more than one cooperating SSB members, were the following individuals: Paul Cox, Kylynn Williams, Kennea Diggs, Durell Clayter, Antonio Landers, Michael Weigel, and the defendant **WILLIAM DEON REDD**, aka "Savage," all members of the Southside Brims. A few of these SSB members had rented a series of rooms at the motel the night of December 4th and were partying. In the early morning hours of December 5th, a fight broke out on the parking lot between two groups; some South Side Brims, and others present in the parking lot. Based upon information provided to your affiant from witnesses, and a review of police records related to the incident, it is your affiant's belief that several SSB members were involved in the fight, to include Weigle, Diggs and **REDD**. During the fight, one cooperator in this case observed **REDD** swinging at a victim in a manner indicative of **REDD** stabbing at him. After the fight broke up, SSB members retreated back into the hotel rooms where cooperators overheard **REDD** boasting "you see how I go", and one observed a significant amount of blood on **REDD**'s shirt.

9. Following the stabbing, investigators searched one of the hotel rooms that had been occupied by defendant Kennea Diggs. They recovered a document entitled "Contact List." This document contained a list of names and telephone numbers. It is attached as *Exhibit A*. It identified various sub-Sets of the SSBs, located across Maryland and beyond. This document not only contained a listing of the members by geographic area, i.e., Frederick, Baltimore City, etc., it also identified each member by their rank, their gang name, and telephone number. Members located within the Maryland Department of Corrections were identified by their inmate identification number in lieu of a telephone number. Incarcerated members were called "G-Wall Homies," and those on the street were "G-World Homies." On this document, the Triple OG was identified as "Redrum." "First Lady Platinum" was on the list, as were several O.G.'s listed

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beneath Roach. These O.G.'s were leaders of the geographic SSB sub-Sets. Under the heading "Baltimore," the first name is "Baby OG Savage." Your affiant knows from the past two years of investigation that "Savage" is **WILLIAM DEON REDD**. This was also confirmed by documents recovered from the computer of the First Lady, Monique Hagler. Specifically, in a document entitled "South Side Brims," and "Updated 02/26/2011," appears the following:

William Redd
Baby OG Savage
2900 Dunmurry Road
Dundalk, MD 21222
(410) 940-4277
Aug. 16, 1984
1020 Gutter
165*495*4788

Your affiant understands that a "1020" in gang lingo indicates the member (in this case, Curtis Cooper, aka "Gutter"), that sponsored **REDD** into the set. Curtis Cooper, aka "Gutter", was at one time a leader of the SSB set in Baltimore, Maryland. A criminal history check on **REDD**, reflects a date of birth of 08/16/1985, (not 1984). A public records search indicated that **REDD** was affiliated with address 2900 Dunmurry Road C, Baltimore, Maryland in April, 2009. His record further reflects arrests for felony drug charges, armed robbery, assaults and burglary. He has at least two felony drug convictions.

10. In April of 2010, law enforcement began a series of wiretaps. These wiretaps on 13 different telephones ran until late December of 2010. On October 20, 2010, Yolanda Knox, an acquaintance of **REDD**, was intercepted speaking with the leader in Frederick, Brandon Fossett. The purpose of her call was so that Fossett, Diggs, and others located in Frederick could raise money to help with **REDD**'s lawyer fees (Call #H-22932). Your affiant knows that one of the perks of membership in a bloods gang is supposed to be that financial assistance for bail,

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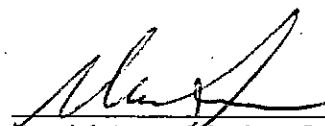
attorneys, etc., can be counted on from other members. On November 8, 2010, **REDD** was intercepted speaking with Altonia Manley, another SSB member in Frederick. **REDD** stated that he was awaiting money from Durrell Prue - another SSB member - which had not yet arrived. **REDD** stated that he had been waiting for the money for three months and felt disrespected by Prue. **REDD** also stated that if Prue did not drop off the money Prue would get knocked out. Later in the call, Manley and **REDD** discussed their respective roles within the criminal enterprise. Manley told **REDD** that he wanted to be **REDD**'s direct subordinate. Manley also told **REDD** that he spoke with First Lady Hagler and that everything was about to change in the organizational structure. (Call #L-1148.) The next day, Yolanda Knox also had a conversation with Manley about how things were going to "get real" when **REDD** came home from jail. (Call #L-1209.)

11. Following these intercepts, the grand jury in the district of Maryland issued an indictment on September 21, 2011, in *United States v. Roach*, Criminal Number: JFM-11-0526. Thirty-five members of the South Side Brims were indicted including Andre Roach, Antonio Landers, Kennea Diggs, Brandon Fossett, Altonia Manley, Derell Prue, Paul Cox, Courtney Gates, Durell Clayter, Kylynn Williams, and Monique Hagler. All but Roach (and another defendant not discussed herein), have pleaded guilty and admitted the existence of this organization. Out of 35 defendants, 14 cooperated and provided information. Several have identified **REDD** as a member of this enterprise. All of the information described herein confirms that this racketeering activity began no later than 2010, and continued until at least the fall of 2011.

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III. CONCLUSION

Your affiant respectfully submits that the information set forth above establishes that there is probable cause to believe that **WILLIAM DEON REDD, also known as "Savage,"** being a person employed by and associated with the South Side Brims, an Enterprise engaged in, and the activities of which affected interstate and foreign commerce, together with Andre Roach, and others, did knowingly and intentionally conspire to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise through a pattern of racketeering activity, in violation of Title 18 United States Code, § 1962(d).



Special Agent Matthew J. Vilcek
Federal Bureau of Investigation

Sworn to and subscribed before me this 18th day of March, 2013.



Timothy J. Sullivan Stephanie A. Gallagher
United States Magistrate Judge